



United States Department of the Interior

FISH AND WILDLIFE SERVICE

New England Field Offices
22 Bridge Street, Unit #1
Concord, New Hampshire 03301-4986

June 2, 1994

Mr. Carl Deloi
U.S. Environmental Protection Agency
J.F. Kennedy Federal Building
Boston, Massachusetts 02203-2211

Dear Mr. Deloi:

We have reviewed the Draft Proposed Plan for Site 9 - Neptune Drive Disposal Site - at the U.S. Naval Air Station (NAS) in Brunswick, Maine. The following comments are provided in accordance with the provisions of the Fish and Wildlife Coordination Act and our interagency agreement for technical assistance.

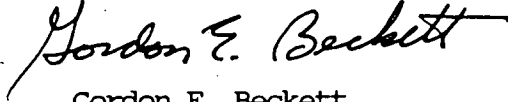
The preferred alternative for Site 9 in the Proposed Plan includes groundwater remediation through natural attenuation, institutional controls to prevent exposure, and long-term monitoring to evaluate groundwater quality over time. The preferred alternative does not address existing PAH contamination in nearby streams that may be harmful to fish and wildlife resources. We have expressed our concern regarding this sediment contamination in a March 29, 1993 letter (attached) and at the January 13, 1994 Technical Review Committee meeting. The Service's position in the March letter regarding PAH contamination in stream sediments at Site 9 is unchanged.

The elevated concentrations of total PAHs (max. 383 ppm) in stream sediments warrant remediation or, at the very least, further investigation. In a NAS environmental management program, unrelated to CERCLA, the Navy plans to install stormwater catchment basins near the site. If non-point sources and runoff from flightline operations are contributing to the contamination at Site 9, these retention ponds should significantly reduce further PAH contamination of the streams. However, a no-action response to existing sediment contamination within the Proposed Plan will likely permit continued exposure of fish and macroinvertebrates to elevated concentrations of PAHs.

The most expeditious course of action for the unnamed streams associated with Site 9 would be "hot spot" remediation of PAH-contaminated sediments after the stormwater catchment basins are created. If the Navy remains reluctant to address stream sediment contamination and remediation in the Proposed Plan, then bioassessment studies should be conducted to document any potential PAH impacts.

If you have any questions regarding these comments, please contact Steve Mierzykowski at (207) 827-5938.

Sincerely yours,

A handwritten signature in cursive script that reads "Gordon E. Beckett". The signature is written in dark ink and has a fluid, connected style.

Gordon E. Beckett
Supervisor
New England Field Offices

cc: K. Finkelstein, NOAA
N. Beardsley, MeDEP
F. Evans, Navy
R. Lim, EPA
S. Svirsky, EPA
Reading File

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